KOCH ENVIRONMENTAL HEALTH, INC.

PO Box 253 • Morrison, Colorado 80465 • Phone: (303) 932-8484 • Fax: (303) 932-8585

February 1, 2012

Mr. Matt Francis
Environmental Restoration, LLC
4870 Newport St.
Commerce City, CO 80022

RE: Revision to Eaton Sugar Beet Factory Asbestos Project Design

Dear Matt,

Per our discussion, included herein is a description of a revision to the Asbestos Abatement Project Design for the Eaton Sugar Beet Factory (ESBF) dated May 28, 2011. The revision is to be considered an addendum by letter and be a part of the ESBF Asbestos Abatement Project Design dated May 28, 2011 (hereafter referred to as the Project Design).

Following is a brief summary of the revision(s) to the Project Design:

1. Addition of Work Area 12 Building 2 Warehouse
2. Sequence of Work Areas revised
3. Description of work practices for areas in which deteriorated brick is present and will remain after abatement/final clearance is complete
4. Description of work practices for providing secondary containment while changing vacuum bags
5. Description of work practices for utilizing a power washer for final cleaning where necessary in the ESBF

Addition of Work Area 12

Approximately 6 ft^2 of TSI debris and 3 linear feet of TSI were discovered in the Building 2 Warehouse in the south side drier room. This material cannot be accessed for abatement from any of the original 11 Work Areas. This material will be removed using methods and materials described in the Project Design. This work area will undergo final clearance visual inspection and air monitoring as described in the Project Design.

Work Area 12 – Building 2 Warehouse South Side Drier Room

a. 28,000 ft^3 / 1400 cfm = 20
b. 20 / 15 minutes per air change X $1.1_{(safety\ factor)}$ = 1.5 NAMs
c. **2 NAMs**

Revision of Work Area Sequence

Abatement will occur in the following sequence, revised from the May 28, 2011 Project Design

1. Work Area 1
2. Work Area 3
3. Work Area 2
4. Work Area 9
5. Work Area 4
6. Work Area 5
7. Work Area 6
8. Work Area 7
9. Work Area 8
10. Work Area 11
11. Work Area 10
12. Work Area 12

Description of Work Practices for Areas with Deteriorated Brick

Several work areas at the ESBF consist of brick wall construction. The brick in many areas is soft and deteriorated to a point that contact with the brick renders it to powder. The brick is not considered asbestos-containing but rather asbestos-contaminated. Environmental Restoration, LLC (ERLLC) will conduct a thorough cleaning, wipe-down, and HEPA Vacuum of all interior surfaces within each work area, including walls with portions of deteriorated brick such that no visible suspect asbestos contamination is present. ERLLC will use wet methods as described in the Project Design. It is anticipated that the wet method cleaning and HEPA-vacuum operations will be successful in removing residual asbestos contamination on the brick. Upon completion of final cleaning, a CDPHE-certified Air Monitoring Specialist (AMS) will perform a visual inspection to ensure that no visible suspect asbestos debris is present. The AMS will collect microvacuum (microvac) samples for analysis via TEM presence/absence on the deteriorated brick in at least 3 locations within the work area to demonstrate that asbestos contamination has been removed from the brick surfaces. After visual inspection ERLLC will apply lock-down to all area surfaces. The AMS will then conduct aggressive final clearance sampling per CDPHE Regulation No. 8 and as described in the Project Design.

The work practices described above will be employed by ERLLC and the selected AMS in the first 2 work areas in which deteriorated brick is present. Should these 2 work areas render satisfactory results such that no visible suspect debris remains, *ALL* microvac samples indicate *NO* presence of asbestos fibers, and final clearance standards meet CDPHE Regulation No. 8 requirements, no further microvac samples will be collected in other work areas and the work practices will be deemed satisfactory.

Description of work practices for providing secondary containment while changing vacuum bags

ERLLC is utilizing Hurricane vacuum systems for gross removal of dirt and debris within the ESBF. The material being remove is wetted prior to removal and additional water is injected to the system prior to deposit in the double-lined (6ml poly) woven bags to insure that all debris is properly wet prior to

transport for disposal. The bag is within an open top rolloff container which is also double lined with 6ml poly sheeting. When full, the bags need to be changed which requires disconnecting from the vacuum discharge nozzle. ERLLC installs a glove bag around the nozzle/bag interface for primary containment. Secondary containment is provided by opening the end of the rolloff container and installing a poly sheet over the top of the entire rolloff that includes a self closing flap on the open end. The abatement technician enters the flap to access the glove bag and removes and seals the vacuum bag for disposal.

Description of work practices for utilizing a power washer for final cleaning where necessary in the ESBF

ERLLC will utilize powerwashing as a final cleaning procedure. The entire ESBF is a Major Asbestos Spill area that will not be re-used in any manner after abatement. As a Major Asbestos Spill area all surfaces of the ESBF require cleaning prior to achieving final clearance through aggressive air sampling.

ERLLC will utilize all methods available for cleaning the work areas prior to pressure washing and establish a water containment plan prior to beginning operations. The minimum pressure required will be used and power washing will only occur within containment boundaries. All water generated will be captured and containerized by ERLLC such that standing water will not accumulate on the floor below. No water will be allowed to leave the work area. In the event water did migrate from the work area it will be treated as a release and cleaned immediately.

A copy of this letter will be maintained on site in the ERLLC office trailer and will also be submitted for review and approval to the CDPHE Asbestos Unit prior to implementation. Please contact me should you have any questions or comments regarding this matter. Thank you for your consideration.

Best Regards,

Thomas D. Koch, CIH MEPM
Asbestos Project Designer No. 3805